ACTION LEVELS FOR RADIONUCLIDES IN SOILS FOR THE ROCKY FLATS CLEANUP AGREEMENT

PUBLIC REVIEW DRAFT

US DEPARTMENT OF ENERGY
US ENVIRONMENTAL PROTECTION AGENCY
COLORADO DEPARTMENT OF PUBLIC HEALTH AND THE ENVIRONMENT

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ACRONYMS

ALARA	As Low As Reasonably Achievable
ALF	Action Levels and Standards Framework for Surface Water, Ground Water and Soils
ANL	Argonne National Laboratory
CAB	Citizens Advisory Board
CDPHE	Colorado Department of Public Health and the Environment
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
DCF	Dose Conversion Factor
DOE	US Department of Energy
EPA	US Environmental Protection Agency
GI	Gastrointestinal
ICRP	International Commission on Radiological Protection
MCL	Maximum Contaminant Level
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NRC	US Nuclear Regulatory Commission
RFCA	Rocky Flats Cleanup Agreement
RFETS	Rocky Flats Environmental Technology Site
RME	Reasonable Maximum Exposure
SCM	Site Conceptual Model

EXECUTIVE SUMMARY

INTRODUCTION

During the Rocky Flats Cleanup Agreement (RFCA) negotiations, the Action Levels and Standards Framework for Surface Water, Ground Water and Soils (ALF) Working Group realized that setting soil action levels and cleanup standards for radionuclides was a complex process and could not be completed before public notice of the draft RFCA. The RFCA Attachment 5 states that "The parties commit to expeditiously convene a working group to determine the derivation and application of the 15 mrem per year level as well as the derivation and potential application of the 75 mrem per year level." This summary explains the consensus recommendation of that Working Group.

The Working Group convened in early March 1996 and was composed of personnel from the Department of Energy (DOE), the Environmental Protection Agency (EPA), the Colorado Department of Public Health and Environment (CDPHE) and Kaiser-Hill, L.L.C. The Working Group agreed that its charter was to develop technically defensible standards which will not exceed the 15/75 mrem per year dose limits in ALF. The Working Group recognized that the 15/75 requirement was based on EPA's draft 40CFR196, Radiation Site Cleanup Regulations, which were intended for the release of government property. Because the RFCA preamble and the Rocky Flats Vision identify future land uses for the RFETS, which exclude release of government property and permit no residential land use, pertinent sections of the draft regulation were used as guidance for the Working Group.

Radiation dose was chosen as the primary criterion for assessing radionuclide action levels. The ALF called for the consideration of both radiation dose assessment and radiation risk assessment by the working group in making its recommendations. The use of radiation dose to develop action levels is consistent with EPA's draft 40CFR196, Nuclear Regulatory Commission decommissioning requirement, DOE Order 5400.5, "Radiation Protection of the Public and the Environment", and

DOE's proposed 10CFR834. Since these regulations are all radiation dose based, this is compelling evidence that the radiation protection community is recommending the use of radiation dose to limit environmental levels of radionuclides. In addition, the preamble to draft 40CFR196 compares the risks associated with remediation, transportation and disposal of contaminated soils against the risks of leaving contaminated soils in place at the 15/75 mrem per year dose limit. EPA concluded that the use of a 15/75 mrem dose limit to establish action levels is protective of the public. Furthermore, the dose assessment process incorporates all pertinent facets of EPA's CERCLA risk assessment process. The radionuclide working group agrees with the EPA draft regulation and is recommending the use of a radiation dose basis.

To translate the radiation dose requirements into soil action levels, it is necessary to first model radionuclide transport within the environment to a human receptor and then assess the receptor's radiation dose. The "RESRAD" computer code was chosen to model this complex process. RESRAD was specifically developed to calculate the radiation dose to an individual and also to derive action levels for radionuclides in soil. RESRAD has been verified and validated for use in assessing radioactive material in soils. An asset of the RESRAD code is its capability to assess contaminant transport to a human receptor in air, surface water, ground water and unsaturated zone soils over the 1,000 year modeling period as specified in the draft EPA regulation. This makes it possible to calculate radiation dose and action levels over any applicable exposure routes (e.g., ingestion, inhalation and external irradiation pathways) for a given receptor. RESRAD also has the capability to model multiple exposure scenarios (e.g., residential, open space and office worker) and to assess radioactive daughter products over the 1,000 year modeling period. The radionuclide working group recommends the use of RESRAD in calculating action levels for the RFETS.

SITE CONCEPTUAL MODEL

There are two separate soil types that need to be assessed at the RFETS: surface soils and subsurface soils. Surface soils are defined in the ALF from the surface to a depth of 15 cm. Consistent with the

RFCA preamble and the Rocky Flats Vision, ALF specifies that surface soil action levels would be derived using an open space exposure scenario in the buffer zone and an office worker exposure scenario in the industrial area. Subsurface soils are defined in the ALF from a depth of 15 cm to the top of the ground water table. Per the ALF, subsurface soil action levels are protective of surface water standards through ground water transport of contaminants to surface water. Ground water is not considered a potential drinking water source at RFETS as prescribed in the RFCA preamble and the Rocky Flats Vision.

Per the RFCA preamble and the Rocky Flats Vision, institutional controls may be applied at RFETS. Use of institutional controls may be considered under EPA's draft 40CFR196 when releasing a site. EPA's draft regulation states that any radioactive material in surface soils shall not impart an annual radiation dose to the appropriate human receptor (e.g. an open space receptor in the buffer zone or an office worker receptor in the industrial area) in excess of 15 millirem. Since radiation dose is being examined for a 1,000 year time period, the draft EPA regulation conservatively assumes that institutional controls fail in the future and that a hypothetical resident moves onto the site. Due to the long lived nature of radionuclides at Rocky Flats, the working group is recommending the assessment of a hypothetical future resident. This recommendation was a conscious decision by the working group despite the guidance in the vision which provides for no future residential uses. The annual radiation dose received by this hypothetical future resident will not exceed 85 millirem (Note: The annual radiation dose for this hypothetical individual in EPA's draft 40CFR196 recently changed from 75 mrem to 85 mrem).

There are two action levels that need to be calculated for surface soils. Tier I action levels are numeric levels that, when exceeded, trigger an evaluation, remedial action and/or management action, given the presence of institutional controls. Tier II action levels are numeric levels that, when met, do not require remedial action and/or institutional controls. The final action levels were derived by examining both the hypothetical future resident action levels and the action levels based on the most appropriate land use and then choosing the most conservative action level. The radionuclide working group recommends adopting the Tier I and Tier II methodology outlined in the "Action Levels and Standards Framework for Radionuclides in Surface Water, Groundwater and Soils (ALF)." Proposed modifications to ALF and a discussion of put-back levels can be found in the document entitled, "Modifications to the Action Levels and Standards Framework." Table ES-1, "Tier I & II Soil Action Levels," outlines the Tier I and Tier II action levels being recommended by the radionuclide working group. The working group is recommending that the hypothetical future resident exposure scenario at the 85 mrem level be the Tier I action level for surficial soils in the buffer zone. The working group is also recommending that the office worker exposure scenario at the 15 mrem level be the Tier I action level for surficial soils in the industrial area. Further, the working group is recommending that the Tier II action level be the hypothetical future resident exposure scenario at the 15 millirem level.

Per the ALF, subsurface soil action levels must be protective of surface water standards through the transport of contaminants in ground water. The ALF requires that subsurface soil action levels be based on the leaching of contaminants to ground water, such that the ground water levels are protective of surface water standards. This concept was discussed by the radionuclide working group and not recommended for use at RFETS. Since the subsurface soils at RFETS are highly heterogeneous, it is not currently possible to accurately model radionuclide transport in these subsurface soils. Therefore, the radionuclide working group currently recommends a conservative approach by applying the Tier I and Tier II surface soil action levels to the subsurface soils. In addition, subsurface soil leaching of radionuclides to ground water is currently being investigated at the RFETS. If an accurate subsurface soil leaching model can be developed for RFETS in the future, and is agreed upon by the RFCA parties, the current working group recommendations may need to be updated.

RESRAD INPUT PARAMETERS

In the RESRAD computer code, there are approximately seventy different inputs that were discussed and agreed upon by the radionuclide working group for each exposure scenario. Site-specific values

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were chosen for these inputs whenever possible so that the action levels could be tailored to RFETS. If a site-specific value was not available, the RESRAD default input was used. The RESRAD code was used to evaluate the office worker exposure scenario, the open space exposure scenario and the hypothetical future resident exposure scenario over the 1,000 year modeling period.

RECOMMENDATIONS

The working group recommends that the hypothetical future resident exposure scenario at the 85 mrem level be the Tier I action level for surficial soils in the buffer zone. The working group also recommends that the office worker exposure scenario at the 15 mrem level be the Tier I action level for surficial soils in the industrial area. Further, the working group is recommending that the Tier II action level for the entire site be the hypothetical future resident exposure scenario at the 15 millirem level. Soils with levels of radionuclides at or below the Tier II action level do not require remedial action and/or institutional controls. Although direct exposure to subsurface soils is not anticipated for the hypothetical future resident, open space or office worker exposure scenarios, the radionuclide working group currently recommends conservatively applying the Tier I and Tier II surface soil action levels to the subsurface soils. This subsurface soil recommendation may be updated in the future. Table ES-1 outlines these Tier I and Tier II action levels.

This working group acknowledges that in the future, new regulations, different guidance, improved calculation methods and models and better input parameters will likely become available. As this new information becomes available it will be considered in accordance with paragraph 5 of RFCA.

APPLICATION

Action levels as calculated above are only applicable when a single radionuclide is found in the environment. This is not the case at RFETS. In the environment at RFETS, the uranium (U) isotopes of U-234, U-235 and U-238 are found together, and the americium (Am) and plutonium (Pu)

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isotopes of Am-241 and Pu-239/240 are found together. When multiple radionuclides are found in the environment, it must be ensured that the sum of the radiation doses from all radionuclides present does not exceed the action level basis (e.g., a hypothetical future resident assessed at the 15 mrem level).

The action levels for americium and plutonium together can also be calculated since the activity of Am-241 is about 18% of the Pu-239+Pu-240 (Pu-239/240) activity in the environment (Ibrahim, 1996). Given this activity ratio, the action level for Am-241 and Pu-239/240 can be computed so that the sum of their radiation doses equals either 15 or 85 millirem to the appropriate exposure scenario. Table ES-1 includes an example of these adjusted action levels for Am-241 and Pu-239/240 if they are the only radionuclides present in soil. Since the 18% ratio actually varies in the environment, site specific data will be used to make action level comparisons. If uranium is also present in the soil, then the contribution to the radiation dose from the uranium also needs to be assessed so that the Tier I and/or Tier II action level basis is not exceeded.

TABLE ES-1
TIER I & II SOIL ACTION LEVELS

Tier I Action Level For The Buffer Zone (Hypothetical Resident)

Radionuclide	Hypothetical Resident - 85 mrem Annual Radiation Dose (a) (pCi/gram)	Hypothetical Resident - Ratio Sum to 85 mrem Annual Radiation Dose (b) (pCi/gram)
Americium-241	215	117
Plutonium-239/240	1429	651
Uranium-234	1738	
Uranium-235	135	
Uranium-238	586	

Tier I Action Level for The Industrial Area (Office Worker)

Radionuclide	Office Worker - 15 mrem Annual Radiation Dose (a) (pCi/gram)	Office Worker - Ratio Sum to 15 mrem Annual Radiation Dose (b) (pCi/gram)
Americium-241	209	101
Plutonium-239/240	1088	562
Uranium-234	1627	
Uranium-235	113	
Uranium-238	506	

Tier II Action Level For RFETS (Hypothetical Resident)

Radionuclide	Hypothetical Resident - 15 mrem Annual Radiation Dose (a) (pCi/gram)	Hypothetical Resident - Ratio Sum to 15 mrem Annual Radiation Dose (b) (pCi/gram)
Americium-241	38	21
Plutonium-239/240	252	115
Uranium-234	307	
Uranium-235	24	
Uranium-238	103	

(a) - These values apply to single radionuclides only which does not occur in the environment at RFETS. The "Sum of Ratios" method will be applied at RFETS so that the total dose from multiple radionuclides are correctly assessed.

(b) - This example assumes that the Am-241/Pu-239 activity ratio equals 0.18 and that only Pu-239 and Am-241 are present

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SECTION 1
INTRODUCTION

During the Rocky Flats Cleanup Agreement (RFCA) negotiations, the Action Levels and Standards Framework for Surface Water, Ground Water and Soils (ALF) Working Group realized that setting soil action levels and cleanup standards for radionuclides was a complex process and could not be completed before public notice of the draft RFCA. Therefore a radionuclide working group was formed to undertake this task. This report discusses the formation of a radionuclide working group, the radionuclide working group's application of the 15/75 mrem methodology as outlined in the draft RFCA and the radionuclide working group's recommendations concerning radionuclide action levels in soils.

Section 2 of this report discusses the formation of the radionuclide working group along with the goals of the working group. The working group members represent the US Department of Energy (DOE), the US Environmental Protection Agency (EPA), the Colorado Department of Public Health and the Environment (CDPHE) and Kaiser-Hill (K-H) , L.L.C.

Section 3 of this report is a regulatory analysis that describes the regulatory basis for deriving radionuclide action levels in soils. Regulations promulgated by the DOE, EPA and Nuclear Regulatory Commission (NRC) are examined.

Section 4 of this report contains the site conceptual model for surface and subsurface soil assessment. The site conceptual model is the basis for the exposure scenarios used to derive action levels for soils.

Section 5 of this report discusses how the soil action levels were developed. The use of the RESRAD computer model is discussed and the action levels for all applicable exposure scenarios are given.

Appendix A of this report discusses the development of the parameter inputs to the RESRAD computer code for the hypothetical future resident exposure scenario, the open space exposure scenario and the office worker exposure scenario. RESRAD computer code outputs are also in this appendix.

Appendix B of this report discusses the expected chemical form of plutonium in the environment. The chemical form of radioactive material is significant for assessing radiation dose.

Appendix C of this report is an exposure pathway analysis. The exposure pathways applicable to the hypothetical future resident exposure scenario, the open space exposure scenario and the office worker exposure scenario are discussed and delineated.

Appendix D of this report discusses the relative importance of different isotopes of plutonium with respect to human health. The decay of plutonium, the ingrowth of daughters and plutonium toxicity are examined.

SECTION 2
RADIONUCLIDE WORKING GROUP FORMATION AND GOALS

The radionuclide working group convened in early March 1996 and was composed of personnel from the DOE, the EPA, the CDPHE and the K-H Team. The Working Group agreed that its charter was to determine the derivation and application of the 15 mrem per year level as well as the derivation and potential application of the 75 mrem per year level as outlined in the Rocky Flats Cleanup Agreement. The Working Group recognized that the 15/75 requirement was based on EPA's preliminary proposed 40CFR196, Radiation Site Cleanup Regulations.

The goals of the Working Group were:

- To determine and recommend radionuclide action levels for soil;
- To determine and recommend radionuclide put-back levels for soil; and
- To prepare a draft technical justification document which would explain the Working Group's recommendations.

The Working Group believes its recommendations are based on a sound technical, scientific and regulatory foundation. The Working Group has consulted with the Citizens Advisory Board (CAB), the Cities of Broomfield, Westminster, Northglenn and Thornton, and the Rocky Flats Environmental Technology Site (RFETS) expert panel on radionuclide fate and transport concerning any recommendations. Proposed modifications to ALF and a discussion of put-back levels can be found in the document entitled, "Modifications to the Action Levels and Standards Framework."

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SECTION 3
REGULATORY ANALYSIS OF RADIONUCLIDES IN SOILS

3.1 Introduction

In order to calculate action levels for radionuclides, a target radiation dose to an individual must be defined. This target radiation dose could be applicable to a current or future individual. After the target radiation dose is selected, the amount of radioactive material in the environment that corresponds to this target radiation dose can be calculated. This calculated value is the action level.

To select the target radiation dose, applicable regulations need to be reviewed so that regulatory requirements are met. Applicable regulations from the DOE, the EPA and the NRC were reviewed. The following radiation dose standards may apply to the assessment and remediation of radionuclides in the environment at the RFETS. These standards were evaluated so that the requirements of both current and proposed radiation protection standards could be assessed.

* DOE Order 5400.5, "Radiation Protection of the Public and the Environment."

* Proposed Title 10 of the Code of Federal Regulations, Part 834, "Radiation Protection of the Public and the Environment," revised August 25, 1995 (Proposed 10CFR834).

* Draft Title 40 of the Code of Federal Regulations, Part 196, "Radiation Site Cleanup Regulations," dated October 21, 1993 (Draft 40CFR196).

* Proposed Title 10 of the Code of Federal Regulations, Parts 20, 30, 40, 50, 51, 70 & 72, "Radiological Criteria for Decommissioning," dated August 22, 1994 (Proposed 10CFR-NRC).

None of the above regulations is based on assessing and remediating radioactive materials based on risk assessment. EPA is promoting this departure from risk assessment with their draft 40CFR196. Since the DOE, EPA and NRC are promulgating regulations using radiation dose to assess and remediate radioactive material in the environment, risk assessment will not be the basis for calculating action levels.

The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPS) are not being considered to develop action levels; however, DOE is obligated to comply with the requirements of NESHAPS as long as RFETS is a DOE site. The DOE currently has a NESHAPS program in place. If monitoring detects a significant increase in emissions of radionuclides to the ambient air that may be due to radionuclides in soils, a source evaluation and mitigating action may be required. The action levels should be consistent with the NESHAPS requirements, since even the worst areas of soil contamination do not currently cause ambient air to exceed the NESHAPS standards.

3.2 DOE Order 5400.5

DOE Order 5400.5 prescribes the use of a 100 millirem annual radiation dose limit as recommended by the International Commission on Radiological Protection (ICRP, 1977). This order includes a recommendation that a 30 mrem radiation dose limit be applied if the actual use of a site is being examined or if the likely future use of a site is being examined. The order states that acceptable levels of radionuclides in soil shall be derived based on an environmental pathway analysis with specific property data where available. The order further states that acceptable residual radionuclide concentrations will be derived using the RESRAD (Argonne, 1993) environmental transport and radiation dose computer code. An As Low As Reasonably Achievable (ALARA) analysis must be a part of the RESRAD analysis. An ALARA analysis tries to reduce the radiation dose limit taking into account economic, social and technical factors.

The actual use or the likely future use exposure scenario represents the individual that could receive

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the largest radiation dose. For exposure scenarios considered to be less likely but plausible, the 100 millirem/year limit should not be exceeded. These exposure scenarios could include a resident, an industrial worker and/or a recreational user. Radiation dose is assessed for these exposure scenarios every year in a 1,000 year time period.

3.3 Proposed 10CFR834

The provisions of DOE Order 5400.5 are currently being proposed as 10CFR834. Proposed 10CFR834 reiterates the 100 millirem per year radiation dose standard and also states that the starting point for an ALARA analysis would be 25 to 30 millirem per year. This regulation requires an environmental pathway analysis using approved models such as RESRAD to derive acceptable levels of radionuclides in the soil. With respect to exposure scenarios, 10CFR834 states that the actual and likely use scenarios and the worst plausible use scenario shall be evaluated. The requirement to evaluate the worst plausible use is only a secondary check to ensure that application of the likely use scenario does not overlook an extremely hazardous situation or a very susceptible subgroup. 10CFR834 also recommends that the dose assessment be performed for a 1,000 year time period.

3.4 Draft 40CFR196

Draft 40CFR196 states that a remediation standard of 15 mrem/yr should be used at sites with radioactive material in all environmental media. This radiation dose limit would apply to sites where the future land use is either unrestricted or restricted following remediation activities. If the land use at a site is restricted (e.g., restricting land use to open space use), the 15 mrem/year limit would apply to the restricted land use. If the land use is restricted, draft 40CFR196 also requires the assessment of the unrestricted release exposure scenario (i.e., residential exposure scenario). The radiation dose to be received by an unrestricted release exposure scenario will not exceed 75 mrem/yr (This has recently been updated to 85 mrem/yr.) so that any individual will not receive more than the ICRP recommended dose limit of 100 millirem even if land use restrictions fail in the future. An

ALARA analysis is not required.

EPA performed an extensive regulatory review before promulgating draft 40CFR196. The preamble to draft 40CFR196 compares the risks associated with remediation, transportation and disposal of contaminated soils against the risks of leaving contaminated soils in place at the 15/75 mrem per year dose limit. EPA concluded that the use of a 15/75 mrem dose limit is protective of the public. EPA recognized that the dose assessment process incorporates all pertinent facets of a CERCLA risk assessment process.

A 1,000 year time period also needs to be assessed to comply with the requirements in draft 40CFR196. This requirement came from the fact that many sites contain radionuclides with very long half-lives. The use of this assessment period will ensure that the creation of decay products and the long-term integrity of any land use restrictions are adequately considered.

3.5 Proposed 10CFR-NRC

The proposed NRC decommissioning regulations are directly comparable to the EPA's draft 40CFR196 regulations. The NRC uses a 15 mrem/yr radiation dose limit for both unrestricted and restricted land uses at a site just like the EPA draft standard. If a site is implementing land use restrictions, the NRC allows an individual in the future to receive a radiation dose of 100 millirem instead of 85 millirem. The NRC uses a 1,000 year assessment period and requires that an ALARA analysis be performed.

3.6 Rocky Flats Cleanup Agreement Regulatory Basis

The Radionuclide Action Levels Working Group has decided to use the draft 40CFR196, "Radiation Site Cleanup Regulations," regulations to derive action levels at the RFETS. This decision was made by the working group for the following reasons:

* Remediation activities at the RFETS follow EPA and State of Colorado remediation requirements as outlined in the Rocky Flats Cleanup Agreement (RFCA). For radionuclide remediation, EPA's most current regulations need to be addressed.

* Draft 40CFR196 is based on an extensive review of available radiation protection information.

* Draft 40CFR196 is expected to be promulgated in the near future.

* Draft 40CFR196 is not inconsistent with the requirements of DOE Order 5400.5, proposed 10CFR834 and the proposed NRC decommissioning regulations.

* NRC regulations do not apply to DOE facilities.

SECTION 4
SITE CONCEPTUAL MODEL

4.1 Introduction

The Site Conceptual Model (SCM) outlines the land uses that are expected to be present at the RFETS so that action levels can be calculated for these future land uses. The type of land use is very important since the amount of time an individual may contact radioactive material in the environment is directly related to the selected land use. This contact time is then transformed into an amount of radioactive material inhaled or ingested by the individual. Action levels are derived from the radiation dose associated with radioactive material inhaled and ingested, and from external gamma exposure.

4.2 Land Uses at RFETS

Future activities at RFETS include environmental restoration, decontamination and decommissioning, economic development and waste management. The Rocky Flats Local Impact Initiative is currently working with DOE and local development agencies to encourage business development at RFETS. The Rocky Flats Future Site Uses Working Group has also developed recommendations regarding future use of the RFETS property. Residential development at RFETS has not been recommended by this group or by other planning groups. Commercial and industrial uses of developed portions of the site are considered beneficial. Even though commercial development in undeveloped portions of the property has not been ruled out, preservation of this area as open space is consistent with DOE policy, the Rocky Flats Future Site Working Group recommendations and the Jefferson County Planning Department's recommendations. The Jefferson County Board of Commissioners has also adopted a resolution stating its support of maintaining, in perpetuity, the undeveloped buffer zone as open space (DOE, 1995). Open space use assumes no development in these areas.

The land uses for RFETS are prescribed by the Rocky Flats Cleanup Agreement (RFCA) in the preamble to that document (RFCA, 1996). The preamble states that cleanup decisions and activities are to be based on open space use and limited industrial use at RFETS. These land uses are consistent with the direction of local government as outlined above. In the near-term condition, the inner and outer buffer zones will be managed and remediated to accommodate open space uses. At the beginning of the intermediate term condition, open space use in these areas will still be applicable. Industrial uses are applicable in the industrial area of the plant in the near and intermediate term conditions. The RFCA prescribes that specific future land uses and post-cleanup designations will be developed in consultation with local governments.

4.3 Surface Soil Assessment

To be consistent with the RFCA (RFCA, 1996), the basis for radionuclide action levels in surface soils is an open space exposure scenario in the buffer zone and an office worker exposure scenario in the industrial area of the plant. Consistent with 40CFR196, the working group agreed that the hypothetical future residential exposure scenario would also be evaluated. Although conservative, the assessment of a residential exposure scenario is inconsistent with current land use recommendations. Surface soils are defined as the top 15 cm of soil.

The open space exposure scenario assumes that an individual visits the buffer zone a limited portion of the year for recreational activities. This individual could hike on trails or wade in the creeks. This individual is assumed to be exposed to radioactive material in soils by directly ingesting the soils, by inhaling resuspended soils and by external gamma exposure from the soils. Appendix C, "Analysis of Exposure Pathways for use in Deriving Action Levels," contains a detailed discussion on the selection of these three exposure pathways. For an account of the amount of time the open space user spends at RFETS, see Appendix A, "Parameter Justification and RESRAD Output." The action level for the open space exposure scenario is the amount of a specific radioactive material in surface soil that would impart an annual radiation dose of 15 millirem to the open space user during the 1,000 year assessment period.

The office worker exposure scenario assumes that an individual works mainly indoors in a building complex surrounded by extensive paved areas or well maintained landscaping. This individual is assumed to breath outside air and ingest soil from outside the building. This individual is assumed to be exposed to radioactive material in soils by directly ingesting the soils, by inhaling resuspended soils and by external gamma exposure from the soils. Appendix C, "Analysis of Exposure Pathways for use in Deriving Action Levels," contains a detailed discussion on the selection of these three exposure pathways. For an account of the amount of time the office worker spends at RFETS, see Appendix A, "Parameter Justification and RESRAD Output." The action level for the office worker exposure scenario is the amount of a specific radioactive material in surface soil that would impart an annual radiation dose of 15 millirem to the office worker during the 1,000 year assessment period.

The hypothetical future residential exposure scenario assumes that an individual resides at RFETS. This individual lives at RFETS all year and eats homegrown produce. This individual is assumed to breath outside air and ingest soil from outside the residence. This individual is assumed to be exposed to radioactive material in soils by directly ingesting the soils, by inhaling resuspended soils, by external gamma exposure from contaminated soil and by ingesting produce grown in contaminated soil. Appendix C, "Analysis of Exposure Pathways for use in Deriving Action Levels," contains a detailed discussion on the selection of these four exposure pathways. For an account of the amount of time the resident spends at RFETS, see Appendix A, "Parameter Justification and RESRAD Output." The action level for the residential exposure scenario is the amount of a specific radioactive material in surface soil that would impart an annual radiation dose of 15 millirem or 85 millirem to the hypothetical resident during the 1,000 year assessment period.

In order to carry out the original weapon-building mission, personnel at RFETS handled plutonium (Pu), americium (Am) and uranium (U) in a number of different operations. Rocky Flats plutonium was composed of Pu-238, Pu-239, Pu-240, Pu-241, Pu-242 and Am-241 (DOE, 1980), and the isotopes of uranium handled at RFETS are U-234, U-235 and U-238. Action levels in soils have been derived for Pu-238, Pu-239, Pu-240, Pu-241, Pu-242, Am-241, U-234, U-235 and U-238 in the environment.

To calculate the radiation dose to an individual, appropriate Dose Conversion Factors (DCF) must be chosen. These DCFs convert the radioactive material present in an exposure route to a radiation dose. The three exposure routes are the ingestion, inhalation and external gamma exposure from radioactive material in soil. DCFs are therefore available for the ingestion, inhalation and external exposure routes. The DCF for each exposure route differs with the chemical form of the radionuclide. The chemical form for americium, uranium and all daughter products were conservatively chosen so that the DCF would be maximized for each exposure route. The DCFs for plutonium were chosen based on the oxide form. For a detailed discussion of the chemical form of plutonium in the environment, see Appendix B, "Analysis of the Chemical Form of Plutonium in the Environment."

4.4 Subsurface Soil Assessment

Subsurface soils are defined from 15 cm below the ground surface to the top of the ground water table. There are no exposure pathways present for the open space, office worker or hypothetical resident exposure scenarios to subsurface soils. Therefore, these exposure scenarios are not appropriate for subsurface soils. For this reason, the RFCA (RFCA, 1996) states that action levels derived for subsurface soils will be protective of surface water standards via ground water transport of radionuclides leached from subsurface soils. The surface water standard for radionuclides is the Maximum Contaminant Level (MCL) as defined by the RFCA.

The SCM for subsurface soils is represented by radionuclides first leaching from subsurface soils to ground water. The radionuclides in ground water are then transported to surface water where the radionuclide concentration cannot exceed the MCL. The subsurface soil action level is the smallest amount of a specific radioactive material in subsurface soil that would impart an MCL in surface water over the 1,000 year assessment period.

This subsurface soil SCM was examined closely by the radionuclide working group. The geohydrology of the RFETS was examined along with the subsurface soil transport properties of plutonium, americium, uranium and their daughter products. Also, the relationship between the subsurface soil SCM and the surface soil SCM was examined. The radionuclide working group came to the conclusion that a subsurface soil action level for radionuclides could not be developed at this time with the subsurface soil SCM defined by the RFCA. This conclusion was based on the variable characteristics of the SCM. This variability is attributable to 1) a water infiltration rate into the soil which varies both areally across the site and within the subsurface soils, 2) radionuclide-specific distribution coefficients that vary spatially within the subsurface soil, 3) a variable distance from a source of radioactive material in the subsurface soil to surface water and 4) a variable soil unsaturated/saturated zone thickness across RFETS. For these reasons, the radionuclide working group has decided to conservatively apply surface soil action levels to subsurface soils.

Currently there are efforts proceeding that may reduce the variability in the subsurface soil SCM. In the future, this variability may be reduced sufficiently to allow the application of the prescribed subsurface soil SCM. If this occurs, the current recommendation of the radionuclide working group may be modified.

SECTION 5
ACTION LEVEL DEVELOPMENT

5.1 Introduction

All of the ingredients for developing action levels for radionuclides in surface soils have been delineated in the preceding sections. A radiation dose limit has been established, the applicable exposure scenarios have been defined and the type of soil to be assessed has been defined. All of these facets allow the calculation of a surface soil action level for the open space exposure scenario, the office worker exposure scenario and the hypothetical future residential exposure scenario. Due to the complex nature of action level development, a computer model must be utilized to derive the action levels. The RESRAD computer model was selected for use since it fulfills all modeling requirements. Action levels were developed for the given exposure scenarios in surface soils. These action levels will be used as Tier I and Tier II action levels in the Action Levels and Standards Framework for Surface Water, Groundwater and Soils (RFCA, 1996).

5.2 Computer Code Requirements

There are a number of different processes that need to be assessed to derive action levels. Due to the complexity of each of these processes, it would be beneficial to have a computer code that would assess each of the following processes. For efficiency and compatibility reasons, the ideal computer code would incorporate all of the following processes. It is also important that the computer code(s) be validated and verified.

The first process that has to be modeled is the transport of radioactive material in surface soil to an individual. This transport can include soil transport in air, surface water, ground water and/or unsaturated zone pore water. For assessing surface soil, the most important environmental transport process for deriving action levels is the air transport process. This is important for the inhalation exposure pathway. All other environmental transport processes serve to decrease the amount of

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radioactive material present in surface soil. This decrease in radioactive material over time increases the action level over time. All environmental transport processes modeled must be able to assess the movement of radioactive material and their daughter products over the 1,000 year assessment period.

The second process that needs to be examined is the exposure of a receptor to the radioactive material in the soil. There are four exposure pathways that need to be assessed by the chosen computer code. These pathways include incidental ingestion of soil, inhalation of resuspended soil, external gamma exposure from radionuclides in the soil and ingestion of homegrown produce.

The next process to be concerned with is radiation dosimetry. Once the radioactive material enters the body, a radiation dose must be calculated so that an action level can be derived. There are three modes through which radioactive material can impart radiation dose to an individual. These are through the ingestion of radioactive material, the inhalation of radioactive material and external gamma exposure from radioactive material in soil. All three of these radiation dose modes need to be assessed for each radionuclide. Since a 1,000 year assessment period is required, the radiation dose from daughter products must also be assessed.

5.3 Computer Code Selection

The RESRAD computer code (Argonne, 1993) was selected for use in deriving surface soil action levels because it meets all modeling requirements. RESRAD was developed at Argonne National Laboratory for the US Department of Energy (DOE) so that radiation dose to an individual as well as action levels could be derived for radioactive material in soils. RESRAD can model all four of the above processes in an integrated manner and can assess daughter products over the 1,000 year modeling period. RESRAD has also been validated and verified (Argonne, 1994).

Surface soils can be physically modeled by the RESRAD code. Soils are broken down into layers within the code, and the top layer, at the ground surface, can be a cover or a contaminated zone. For deriving surface soil action levels, the contaminated zone is considered to be the surface soils with no cover. Underneath the contaminated zone, RESRAD has the capacity to model five separate uncontaminated/unsaturated layers before reaching ground water. This configuration meets the requirements for deriving action levels at the RFETS.

RESRAD can model the required environmental transport processes. It contains an air transport algorithm that looks at resuspension of radioactive material in soils and transport to an individual. The assessment of the air transport pathway is essential to calculating surface soil action levels. Unsaturated zone transport and ground water transport processes are also assessed within the RESRAD code. These two algorithms will allow leaching of radioactive material out of the surface soils for the 1,000 year assessment period. These unsaturated zone transport and ground water transport algorithms could be used in the future to model the leaching of contaminants from subsurface soils at the RFETS. With respect to environmental transport requirements, RESRAD meets the requirements for deriving action levels at RFETS.

The RESRAD code can model the four exposure pathways: incidental ingestion of soil, inhalation of resuspended soil, external gamma exposure from radionuclides in the soil and ingestion of homegrown produce. RESRAD can assess nine exposure pathways in total. These exposure pathways are external gamma exposure, soil inhalation, plant ingestion, meat ingestion, milk ingestion, aquatic food ingestion, drinking water ingestion, soil ingestion and radon exposure. This shows the flexibility of the RESRAD code in assessing many different situations. Exposure pathways can be turned on and off in RESRAD depending on the specific situation. Concerning exposure pathways, this meets the requirements for deriving action levels at the RFETS.

The RESRAD code also has an extensive library of radionuclides in their radiation dosimetry module. This allows the calculation of radiation dose and action levels on the radionuclides of interest and on their daughter products over the 1,000 year modeling period. The radionuclide database includes inhalation, ingestion and external exposure Dose Conversion Factors (DCF). These DCFs are also available within RESRAD for the different chemical forms of radionuclides. Concerning the use of DCFs, this meets the requirements for deriving action levels at the RFETS.

5.4 RESRAD Parameter Input Development

There were four separate RESRAD computer runs that needed to be performed to obtain all required action levels. These included the following:

* An Open Space Exposure Scenario Assessed at the 15 Millirem Level
* An Office Worker Exposure Scenario Assessed at the 15 Millirem Level
* A Hypothetical Future Resident Assessed at the 15 Millirem Level
* A Hypothetical Future Resident Assessed at the 85 Millirem Level

There were 53 separate input parameters to the RESRAD code for the open space and office worker exposure scenarios. The hypothetical future resident had 83 separate input parameters. The parameters for all of these exposure scenarios were chosen to be as site specific as possible to satisfy the requirements of the site conceptual model. When a site specific parameter was not available, the RESRAD default parameter was used. For a discussion of all parameter inputs with their selected values, see Appendix A, "Parameter Justification and RESRAD Output."

5.5 RESRAD Modeling Results

Table 5-1, "Single Radionuclide Soil Action Levels," outlines the Tier I and Tier II action levels developed using RESRAD. The action levels in this table represent the radionuclide-specific activity in the soil that would impart a maximum radiation dose of either 15 millirem or 85 millirem to the given exposure scenario over the 1,000 year modeling period.

5.6 Use of RESRAD Modeling Results

The action levels outlined above need to be applied in the field. To do this, a number of simplifying assumptions can be made while still assuring the protectiveness of the action levels. This simplification allows implementation of these action levels in an efficient manner.

The first simplification is that the number of radionuclides needing assessment at RFETS can be reduced. All uranium (U) radionuclides present at RFETS (e.g., U-234, U-235 and U-238) in the environment will be assessed with respect to their action levels. Appendix D, "Analysis of Assessment Needs for Rocky Flats Plutonium," outlines the reasons why the only constituents from Rocky Flats plutonium that need to be assessed in the environment are Pu-239, Pu-240 and Am-241. All isotopes of Rocky Flats plutonium were initially assessed for completeness since plutonium in the nuclear fabrication process was composed of Pu-238, Pu-239, Pu-240, Pu-241 and Pu-242 (DOE, 1980). Am-241 is also contained in this mix of plutonium due to its ingrowth from Pu-241 (DOE, 1980). The plutonium found in the environment though will have different activities of plutonium and americium than what is found in the fabrication process because of radionuclide decay and ingrowth over time. In examining this decay and ingrowth with regard to radionuclide toxicity, it is shown in Appendix D that it is necessary to only assess Pu-239, Pu-240 and Am-241 in the environment.

The number of exposure scenarios that need to be examined can also be reduced. The more conservative of the Tier I action level for the open space exposure scenario and the Tier I action level for the hypothetical future resident will be applied in the buffer zone at RFETS. Also, the more conservative of the Tier I action level for the office worker exposure scenario and the Tier I action level for the hypothetical future resident will be applied in the industrial area at RFETS. These comparisons were made and the result is that the Tier I action level in the buffer zone will be based on the hypothetical future resident exposure scenario and that the Tier I action level in the industrial area will be based on the office worker exposure scenario. Table 5-2, "Tier I & II Soil Action Levels," outlines the soil action levels after the above simplifications are made.

To assure that the soil action levels will be protective of human health when multiple radionuclides are present, the sum of the radiation doses from all radionuclides in soil must not exceed the Tier I or Tier II dose limit of 15 millirem or 85 millirem. A "Sum of Ratios" method will be used when more than one radionuclide is present in soils. Table 5-3, "Sum of Ratios Example," outlines this method. First, a ratio is formed for each radionuclide by dividing the activity of the radionuclide found in soils by the appropriate soil action level. This ratio actually represents the fraction of the radiation dose from the action level. In Table 5-3, the action level chosen for comparison is the Tier II action level for RFETS which is the hypothetical future resident assessed at the 15 millirem level. In this example, the radiation dose from U-235 is 1% of 15 millirem or 0.15 millirem at a soil activity of 0.3 pCi/gram. Therefore, when the ratio from each radionuclide is summed, this ratio sum is the fraction of the radiation dose limit for the action level. In Table 5-3, the sum of the ratios is 0.22 or 22% of 15 millirem. In this example, the Tier II action level is not exceeded since the sum of ratios is less than or equal to 1.0. If the sum of ratios exceeded 1.0, the action level would be exceeded.

The action levels for americium and plutonium together can also be calculated since the activity of Am-241 is about 18% of the Pu-239+Pu-240 (Pu-239/240) activity in the environment (Ibrahim, 1996). Given this activity ratio, the action level for Am-241 and Pu-239/240 can be computed so that the sum of their radiation doses equals either 15 or 85 millirem to the appropriate exposure scenario. Table 5-2 includes an example of these adjusted action levels for Am-241 and Pu-239/240 if they are the only radionuclides present in soil. Since the 18% ratio actually varies in the environment, site specific data will be used to make action level comparisons. If uranium is also present in the soil, then the contribution to the radiation dose from the uranium also needs to be assessed so that the Tier I and/or Tier II action level basis is not exceeded.

Chemical action levels are risk-based, and chemical risk is considered additive when multiple chemicals are present. Radionuclide action levels are dose-based, and radiation dose is considered additive when multiple radionuclides are present. Chemicals and radionuclides will be assessed independently on a project-specific basis using methodology that is protective of human health and the environment. The cumulative effects of chemicals and radionuclides will be assessed on a project-specific basis if the chemical risk and the radionuclide dose are near their respective Tier I action levels.

5.7 Action Level Uncertainties

The calculated values recommended as action levels are based on several assumptions which have associated limitations. These include:

1. The regulatory basis for developing these action levels is EPA's draft rule, 40CFR196, which is not yet final and may be changed before it is promulgated.

2. Any environmental computer model, including the RESRAD model, has inherent limitations with regard to precise simulation of the actual environment. Some of these limitations involve which input parameters are chosen to represent the complex natural setting which may vary across a large site. Environmental transfer factors and dose conversion factors used in the model may not always reflect site-specific conditions.

3. There are inherent uncertainties in estimating either dose or risk from ionizing radiation.

4. Institutional controls will eliminate the ground water ingestion pathway by establishing specific land uses and controls on ground water use. A basic assumption of RFCA is that ground water from contaminated areas of the site is captured, controlled and measured within the surface water system before leaving the site. An additional assumption is that the small amount of shallow ground water is not a sustainable, viable source of residential drinking water.

5. Attachment 5 of RFCA requires subsurface soil action levels to be protective of surface water

standards via ground water, and surface soil action levels to be protective of surface water standards via runoff. Existing data supports the proposition that radionuclides in soil are stable and relatively immobile. This is the basis for determining not to include these transport pathways in the modeling done to develop the proposed action levels. It is also assumed that actions required by the proposed action levels for radionuclides in soil (removals and/or stabilization) will provide sufficient protection for surface water. Those actions will control the worst areas of radiological contamination in soils, and so far, even these areas have not impacted surface water above the 0.15 pCi/L level at the point of compliance.

6. The proposal to set subsurface soil action levels equal to surface soil action levels assumes there will be no uncontrolled human exposure to subsurface soils and presumes that surface soil action levels will be protective of surface water via ground water. It is also assumed that the proposed surface soil action levels are lower than values that any subsurface soil modeling would produce.

This working group acknowledges that in the future, new regulations, different guidance, improved calculation methods and models and better input parameters will likely become available. As this new information becomes available it will be considered in accordance with paragraph 5 of RFCA.

TABLE 5-1
SINGLE RADIONUCLIDE SOIL ACTION LEVELS

Radionuclide	TIER I ACTION LEVEL Open Space Exposure Scenario, Surficial Soils Exposure, 15 Millirem Dose Limit (pCi/gram)	TIER I ACTION LEVEL Office Worker Exposure Scenario, Surficial Soils Exposure, 15 Millirem Dose Limit (pCi/gram)	TIER I ACTION LEVEL Hypothetical Residential Exposure Scenario, Surficial Soils Exposure, 85 Millirem Dose Limit (pCi/gram)	TIER II ACTION LEVEL Hypothetical Residential Exposure Scenario, Surficial Soils Exposure, 15 Millirem Dose Limit (pCi/gram)
Americium-241	1283	209	215	38
Plutonium-238	10580	1164	1529	270
Plutonium-239	9906	1088	1429	252
Plutonium-240	9919	1089	1432	253
Plutonium-241	48020	7801	19830	3499
Plutonium-242	10430	1145	1506	266
Uranium-234	11500	1627	1738	307
Uranium-235	1314	113	135	24
Uranium-238	5079	506	586	103

* The action levels in this table apply to single radionuclides only which does not exist at RFETS. See text for application of these action levels.

TABLE 5-2
TIER I & II SOIL ACTION LEVELS

Tier I Action Level For The Buffer Zone (Hypothetical Resident)

Radionuclide	Hypothetical Resident - 85 mrem Annual Radiation Dose (a) (pCi/gram)	Hypothetical Resident - Ratio Sum to 85 mrem Annual Radiation Dose (b) (pCi/gram)
Americium-241	215	117
Plutonium-239/240	1429	651
Uranium-234	1738	
Uranium-235	135	
Uranium-238	586	

Tier I Action Level for The Industrial Area (Office Worker)

Radionuclide	Office Worker - 15 mrem Annual Radiation Dose (a) (pCi/gram)	Office Worker - Ratio Sum to 15 mrem Annual Radiation Dose (b) (pCi/gram)
Americium-241	209	101
Plutonium-239/240	1088	562
Uranium-234	1627	
Uranium-235	113	
Uranium-238	506	

Tier II Action Level For RFETS (Hypothetical Resident)

Radionuclide	Hypothetical Resident - 15 mrem Annual Radiation Dose (a) (pCi/gram)	Hypothetical Resident - Ratio Sum to 15 mrem Annual Radiation Dose (b) (pCi/gram)
Americium-241	38	21
Plutonium-239/240	252	115
Uranium-234	307	
Uranium-235	24	
Uranium-238	103	

(a) - These values apply to single radionuclides only which does not occur in the environment at RFETS. The "Sum of Ratios" method will be applied at RFETS so that the total dose from multiple radionuclides are correctly assessed.

(b) - This example assumes that the Am-241/Pu-239 activity ratio equals 0.18 and that only Pu-239 and Am-241 are present

TABLE 5-3
SUM OF RATIOS EXAMPLE

15 mrem Residential Action Level Comparison

Radionuclide	Action Level (pCi/gram)	Soil Activity (pCi/gram)	Soil Activity to Action Level Ratio
Americium-241	38	2.6	0.07
Plutonium-239	252	13.8	0.05
Uranium-234	307	6.8	0.02
Uranium-235	24	0.3	0.01
Uranium-238	103	6.4	0.06
		SUM OF RATIOS	0.22

Decision Criteria

SUM OF RATIOS $\leq$ 1: ACTION LEVEL MET
SUM OF RATIOS > 1: ACTION LEVEL EXCEEDED

SECTION 6
REFERENCES

References

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